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March 1, 2011

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Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: Case No. FD 35380, San Luis & Rio Grande Railroad
Petition for Declaratory Order

Dear Surface Transportation Board Members:

Concerned Citizens for Nuclear Safety (CCNS) is a non-governmental organization based in Santa Fe, New Mexico. CCNS formed in 1988 to advocate for community concerns about the proposed transportation of nuclear, chemical, and mixed hazardous waste from Los Alamos National Laboratory (LANL) to the then proposed Waste Isolation Pilot Plant (WIPP) through Santa Fe on St. Francis Drive. Since that time, we have been involved in transportation issues.

Mission. The mission of CCNS is to protect all living beings and the environment from the effects of radioactive and other hazardous materials now and in the future.

Background. We provide the following regarding our familiarity about the LANL waste:

CCNS fully participated in the three and one-half year state hazardous waste permitting process for the 10-year permit for LANL with the New Mexico Environment Department (NMED), the Department of Energy (DOE), LANL, and other Interested Party. CCNS reviewed several drafts of the permit, submitted public comments, participated in 40 days of negotiations with all the Parties, prepared pre- and post-hearing briefing, as well as worked with three technical experts in the areas of groundwater protection and alternatives to the open burning of hazardous waste. We participated as Parties to the 15-day formal administrative permit hearing.

CCNS also reviewed drafts of the NMED Compliance Order on Consent (Consent Order) and provided public comments. We were asked to attend the signing of the March 1, 2005 Consent Order at the New Mexico State Capitol.

CCNS is part of the network of non-governmental organizations, called the Communities for Clean Water, who are addressing the contamination that migrates from the leaking waste sites at LANL into the canyons on its way to the Rio Grande. One of the results of that work has been for the Environmental Protection Agency (EPA) to issue one of the most protective storm water permits in the nation.

CCNS appreciates that the Surface Transportation Board (STB) heard the request of the community and took the extraordinary step to hold a public meeting in Conejos, Colorado on Thursday, February 17, 2011. Even though the meeting was held on a workday, it was well attended with over 90 participants. Most of the speakers were opposed to the STB granting an exemption to the San Luis & Rio Grande Railroad under the Clean Railroads Act (CRA).

We are concerned, however, that the issues may not be ripe because there are no current contracts for the proposed truck to rail transfer work.

In the alternative, our comments focus on the fact that the CRA exemptions for "industrial" and "institutional" waste do not apply to the San Luis & Rio Grande Railroad for the LANL waste streams. Based on our knowledge of the waste streams that are being addressed under the March 1, 2005 NMED Consent Order, the waste is from "industrial" and "institutional" waste streams. Further, CCNS will be able to provide to the Board information that the "industrial" and "institutional" waste exemptions will not apply to any possible, future waste streams.

In our comments today, we provide the following information about the LANL waste streams that were proposed for the truck to rail transfer operations in Antonito, Colorado as documented in the DOE Supplement Analysis Site-Wide Environmental Impact Statement for Continued Operation of Los Alamos National Laboratory – Proposed Transport of Low Level Radioactive Waste by Truck and Rail from Los Alamos National Laboratory (LANL) for Disposal at EnergySolutions at Clive, Utah, DOE/EIS-0380-SA-01, October 2009. Supplemental Analysis LANL SWEIS.

<http://www.doeal.gov/aso/Documents/SupplementAnalysisTruckRail102309.PDF>.

The Waste and Contaminated Soil Were Generated by “Industrial” Activities at LANL. CRA Section 10908(e)

LANL is an industrial facility, currently located on 40 square miles on the Pajarito Plateau in north central New Mexico. It is divided into 48 separate Technical Areas. In 2008, DOE reported that LANL structures contained about 8.6 million square feet, comprising about 952 permanent buildings, including specialized facilities that had been built and maintained over years of operations; 373 temporary structures (trailers and transportables); and 897 miscellaneous structures, such as sheds and utility (meteorological towers, water tanks, manholes, and electrical transformers) structures.

Final Site-Wide Environmental Impact Statement for Continued Operation of Los Alamos National Laboratory, DOE/EIS-0380, May 2008, p. 2-12. <http://www.doeal.gov/aso/NEPASWEIS.aspx>

Further,

In January 1943 a wartime laboratory was established at Los Alamos, New Mexico. Its sole mission was the development of a fission bomb. This project culminated in the detonation of the first atomic bombs in 1945. Since then, the primary mission of LASL [Los Alamos Scientific Laboratory] has continued to be nuclear weapons research and development, including the first thermonuclear bomb. However, expansion of Laboratory efforts has incorporated numerous programs to develop peaceful uses of nuclear energy in such areas as fission reactors, space technology, controlled thermonuclear reactions, and medical and biological applications, geothermal and solar energy resources and use of superconductor technology for energy storage and transmission. The four major research program areas are national security, energy, biomedical and environmental, and physical research.

Exhibit 1: Final Environmental Impact Statement, LASL Site, Los Alamos, New Mexico, DOE/EIS-0018, December 1979.

The Department of Energy (DOE) described its plans to ship an estimated 15,000 cubic yards of solid soil/debris waste from three LANL sites. Supplemental Analysis LANL SWEIS. <http://www.doeal.gov/aso/Documents/SupplementAnalysisTruckRail102309.PDF>

The three sites are Material Disposal Area “Y” [also known as Solid Waste Management Unit (SWMU) 39-001(b)], SWMU 39-001(a), and Los Alamos Site Monitoring Area 2 (LA-SMA-2).

The first two waste dumps are located at Technical Area 39 (TA-39), which is a test area for high explosives, located in the southeastern portion of LANL. Explosive testing continues today as part of the Nuclear Weapons Program.

The TA-39 SWMU sites were used as dumps for industrial waste, or “routine” waste, such as “equipment, chemicals, oil, animal tissue, chemical treatment sludge, cement paste, hot-cell waste, and classified materials,” that was contaminated with radionuclides, heavy metals, toxic chemicals. Exhibit 2. History and Environmental Setting of Los Alamos Scientific Laboratory Near-Surface Land Disposal Facilities for Radioactive Wastes: A Source Document, Margaret Anne Rogers, Los Alamos Scientific Laboratory of the University of California, June 1977, LA-6848-MS, Vol. I.

A 1997 LANL report describes SWMU 39-001(a) as a landfill with two burial pits that operated between 1953 and 1979, as follows:

"The pits were used for disposal of materials consisting of debris from firing sites, empty chemical containers, and office waste. Hazardous and radioactive materials that may have been disposed in the pits before 1976 include lead, silver, copper, brass, iron, steel, thallium, cadmium, mercury, beryllium, thorium-232, natural and depleted uranium, PCB-containing oils, HE [high explosives], and solvents."

Exhibit 3. RCRA Facility Investigation Report for Potential Release Sites at TA-39, 39-001 (a & b), LANL Environmental Restoration Project, March 1997, LA-UR-97-XXXX, p. 5-1.

The same report describes SWMU 39-001(b) as a landfill consisting of three pits that operated between the late 1960's and May 1, 1989.

The area was used for disposal of materials containing debris from firing sites, empty chemical containers, and office waste. Wastes from other sites may have been disposed here. Site personnel indicated that large stainless steel targets (1- to 2-ft diameter and 2-ft long) were buried on site. ... These targets were used in the dual-stage gas gun apparatus located in Building TA-39-69 and captured plutonium projectiles. Before disposal, the targets were decontaminated and the resultant waste was disposed at TA-54. Hazardous and radioactive materials disposed in the area before 1976 probably include lead, silver, copper, brass, iron, steel, thallium, cadmium, mercury, beryllium, thorium-232, natural and depleted uranium, PCB-containing oils, HE [high explosives], and solvents.

Id., p. 5-30.

Because of improper waste management practices at LANL, such as burying waste in soils without liners and a leachate collection system, the wastes leaked into the soils, thereby contaminating them. DOE states that "soil and small debris from a LANL disposal area" will be shipped. Enhancing Safety through Rail Shipments," LA-UR-10-00134 Fact Sheet, p. 1.

http://www.lanl.gov/environment/waste/docs/factsheets/transporting_waste_DOE_1-13-10.pdf.

DOE also describes the shipments as containing "debris such as soil, wood, concrete, asphalt, and metal." Id., p. 2.

Further, "[t]he intermodals will be used primarily for 'over sized' waste or large and jagged debris items that could puncture the IP-1 soft-sided containers." Id., p. 4.

Industrial waste is defined in the CRA Section 10908(e) as:

solid waste generated by manufacturing and industrial and research and development processes and operations, including contaminated soil, nonhazardous oil spill cleanup waste and dry nonhazardous pesticides and chemical waste, but does not include hazardous waste regulated under subtitle C of the Solid Waste Disposal Act, mining or oil and gas waste.

It is obvious that the waste excavated from SWMUs 39-001(a) and (b) are from industrial activities, such as manufacturing targets that capture plutonium projectiles shot from dual-stage gas guns.

The third site, named LA-SMA-2, or SWMU 01-001(f), is described as:

is the location of a former septic tank (structure 01-140) that was installed in 1945 and served HT and FP Buildings. The septic tank outfall discharged into Los Alamos Canyon. The outfall area is known as Hillside 140. HT Building was used to heat-treat and machine natural and enriched uranium. FP Building was a foundry for non-radioactive and nonferrous metals. In 1975, the septic tank, its inlet and outlet lines, and surrounding soil were removed. In 1995, soil with elevated concentrations of total uranium was removed from the upper and lower slopes of Hillside 140.

Exhibit 4: LANL Individual Permit Application for Storm Water Discharges from Solid Waste Management Units and Areas of Concern, Permit Application No. NM0030759, Supplemental Information Submittal (Third of Four), Vol. 1, December 21, 2007, LA-UR-07-8364.

It is clear that the contaminated soils from LA-SMA-2 were from "manufacturing and industrial and research and development processes and operations," such as machining natural and enriched uranium and foundry activities. Waste from LA-SMA-2 meets the definition of "industrial waste." CRA Section 10908(e).

The Waste and Contaminated Soils Were Generated by "Institutional" Activities at LANL. CRA Section 10908(e).

LANL is an institutional, government owned, contractor operated (GOCO) facility. The historical record demonstrates that office waste, described as "material discarded by nonmanufacturing activities at [] government facilities," or "material discarded by other similar establishments or facilities" was disposed in SWMUs 39-001(a) and (b). Section 10908(e). The office waste clearly meets the definition of "institutional" waste. See Exhibit 3, pp. 5-1 and 5-30 and Supplemental Analysis LANL SWEIS, p. 1. <http://www.doeal.gov/aso/Documents/SupplementAnalysisTruckRail102309.PDF>

It is clear that the waste and contaminated soils from the TA-39 SWMUs at 39-001(a) and (b) was generated from "institutional" activities at LANL.

The Exemptions of the Clean Railroad Act Do Not Apply to the LANL Waste Streams.

As clearly demonstrated above, the exemptions under the Clean Railroads Act for "industrial" and "institutional" waste do not apply to the LANL waste streams that were proposed for the truck to rail transfer activities in Antonito, Colorado.

We reiterate: Based on our knowledge of the NMED Compliance Order on Consent, CCNS believes we will be able to provide documentation to the Board that any future waste streams proposed for truck to rail transfer activities in Antonito, Colorado are from "industrial" and/or "institutional" waste streams at LANL. We are committed to providing such documentation to the Board should the case arise.

Thank you for your consideration of our comments. Please contact us with any questions or comments.

Sincerely,

Joni Arends
Executive Director

Enclosures: Exhibits 1 through 4

I certify that I electronically served John D. Heffner; PCCL at j.heffner@verizon.net on March 1, 2011.

Final Environmental Impact Statement



Los Alamos Scientific Laboratory Site Los Alamos, New Mexico

U.S. DEPARTMENT OF ENERGY

December 1979

D. M. Kerr, Jr. DIR-0 MS 100

From: **UNIVERSITY OF CALIFORNIA**
LOS ALAMOS SCIENTIFIC LABORATORY
P.O. BOX 1663 - LOS ALAMOS, NEW MEXICO 87545
An Affirmative Action / Equal Opportunity Employer

To: Concerned Citizens of Cerrillos
Attn: Ross Lockridge
Box 22
Cerrillos, NM 87010
Ph - 471-9182

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Form 822

1. SUMMARY

This Environmental Impact Statement (EIS) assesses the environmental impacts of the Department of Energy's* activities at the Los Alamos Scientific Laboratory (LASL) site in Los Alamos and Santa Fe Counties at Los Alamos, New Mexico, and assesses actual and potential impacts on the surrounding environment. The EIS provides environmental input into decisions regarding the continuing activities at the Los Alamos Scientific Laboratory with coverage of some further growth and evolution of research programs in new areas.

In January 1943 a wartime laboratory was established at Los Alamos, New Mexico. Its sole mission was the development of a fission bomb. This project culminated in the detonation of the first atomic bombs in 1945. Since then, the primary mission of LASL has continued to be nuclear weapons research and development, including the first thermonuclear bomb. However, expansion of Laboratory efforts has incorporated numerous programs to develop peaceful uses of nuclear energy in such areas as fission reactors, space technology, controlled thermonuclear reactions, and medical and biological applications. In recent years there has been increasing diversification into nonnuclear research areas, notably geothermal and solar energy resources and use of superconductor technology for energy storage and transmission. The four major research program areas are national security, energy, biomedical and environmental, and physical research.

To illustrate the magnitude of the efforts at LASL, during 1978, employment at the Laboratory and in conjunction with the Laboratory's operations totalled about 8,000. This included employees of DOE's Los Alamos Area Office, the University of California, and other DOE contractors located in Los Alamos. The combined Fiscal Year (FY) 1978 payroll was approximately \$190 million, and project expenditures totalled about \$325 million.

Los Alamos is a small incorporated county, located in north-central New Mexico about 100 km (60 mi) north-northeast of Albuquerque and 40 km (25 mi) northwest of Santa Fe by air (see Figures 1-1 and 1-2). Within the County there are 111-km² (27,500-acre) LASL site (a small portion is in Santa Fe County) and two adjacent communities, informally identified as Los Alamos townsite and White Rock. They are situated on the Pajarito Plateau between the Jemez Mountains to the west and the Rio Grande Valley to the east. The plateau consists of a series of relatively narrow mesas separated by deep, steep-sided canyons that trend east-southeast from the Jemez Mountains down to the Rio Grande.

Most of the Laboratory and community development is confined to the mesa tops. The Laboratory site includes 30 active technical areas, where the 124 principal buildings are located. Tangible use of the Laboratory land area includes building sites, test areas, waste disposal locations,

*The "Department of Energy (DOE)" designation is used throughout this document. However, it should be noted that LASL was operated for the Corps of Engineers from 1943 until 1947, for the Atomic Energy Commission (AEC) from 1947 until January 19, 1975; for the Energy Research and Development Administration (ERDA) from January 20, 1975, until September 30, 1977; and for the Department of Energy since October 1978.

LA-6848-MS, Vol. I

Informal Report

Special Distribution

Issued: June 1977

**History and Environmental Setting of
LASL Near-Surface Land Disposal Facilities for
Radioactive Wastes (Areas A, B, C, D, E, F, G, and T)**

A Source Document

Margaret Anne Rogers



An Affirmative Action/Equal Opportunity Employer

UNITED STATES
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION
CONTRACT W-7405-ENG. 36

As the data were being collected for the evaluation, it became apparent that LASL had a need for a report which would parallel the USGS Report to the ERDA but which would include much more detail.

This report has been compiled to provide a readily available source of accurate, in-depth information for reference by LASL personnel. It is as comprehensive as time and information sources allowed.

In compiling the information presented in this report, opinions and conclusions as to the accuracy of any particular source material have been avoided. All sources on a given subject are presented, despite apparent contradictions. The reader must therefore draw his own conclusions as to which sources may have the greater validity. By presenting all sources, bias is hopefully minimized.

General information on Areas A, B, C, D, E, F, G, and T can be found in the Summary; comprehensive information is given under individual area discussions. Appendixes A, B, and C are lists of known photographs, photographic slides, and engineering drawings, respectively, of Areas A, B, C, D, E, F, G, and T.

Metric units followed by English conversion in parentheses are used throughout this document except in quoted material, which has been left in its original form.

A. History of Los Alamos

From 1918 until late 1942, Los Alamos was the site of a boy's ranch school.¹ Because of its isolated location and existing facilities, the school was acquired by the Army, November 25, 1942, for use by the Manhattan Engineer District. As a patriotic gesture¹ the University of California accepted the contract to operate the new laboratory January 1, 1943. After the war, Los Alamos continued as a site of government sponsored scientific research operated by the University under the auspices of the USAEC through 1974 and continues under the auspices of ERDA.

B. Location

Los Alamos and the Los Alamos Scientific Laboratory are located on the Pajarito Plateau, which flanks the eastern side of the volcanic Jemez Mountains in north-central New Mexico. The plateau is 16-24 km (10-15 mi) wide and more than 48 km (30 mi) long. It is bounded on the west by the Sierra de los Valles, on the east by the Rio Grande, on the northeast by the Puye Escarpment, and on the southwest by Canada de Cochiti (Figs. 2a and 2b).

The plateau slopes eastward from an elevation of 2377 m (7800 ft) abutting the Sierra de los Valles to an elevation of 1890 m (6200 ft) adjacent to the Rio Grande. It is cut 61-122 m (200-400 ft) deep by numerous southeast trending intermittent streams. The dissected eastern margin of the plateau rises 91-305 m (300-1000 ft) above the Rio Grande.

Los Alamos is 38.6 km (23 mi) northwest of Santa Fe and 92.8 km (58 mi) north-northeast of Albuquerque.

C. Radioactive Wastes Generated by the LASL

LASL radioactive wastes are categorized as routine or nonroutine. Most of the waste is routine, consisting of Laboratory trash (mostly combustible), equipment, chemicals, oil, animal tissue, chemical treatment sludge, cement paste, hot-cell waste, and classified materials. Nonroutine waste, generated during facility renovation and decommissioning projects, consists of building debris, large equipment items, and soil or rock removed during site cleanup.

The wastes may be contaminated by transuranic radionuclides (²³⁹Pu, ²⁴⁰Pu, or ²⁴¹Am), uranium (enriched, depleted, normal or ²³⁵U), fission products, induced activities, or tritium. Wastes contaminated by fission products, induced activities, and tritium are small in volume, 1-3% of the whole, but high in total curies disposed of by LASL.

RFI Report for Potential Release Sites at TA-39

39-001(a & b),
39-004(a - e),
39-008

(located in former
Operable Unit 1132)

Field Unit 2

Environmental Restoration Project

March 1997

A Department of Energy
Environmental Cleanup Program

Los Alamos
NATIONAL LABORATORY

LA-UR-97-XXXX

5.0 SPECIFIC RESULTS, CONCLUSIONS, AND RECOMMENDATIONS

The objective of the sampling described in this report was to provide data of sufficient quality for decisions in a screening level risk assessment as outlined in Chapter 3. The assessment of the analytical results associated with PRSs 39-001(a and b), in addition to the results of limited stream channel sampling, was used to support a determination of no further action (NFA).

5.1 PRS 39-001(a) - Landfill

PRS 39-001(a) is a waste burial area adjacent to Building TA-39-69 and anecdotal information suggests that it consisted of two trenches—one partially under Building TA-39-69 and the other covered by a basketball/volleyball court. During excavation of the test pits, normal-office trash, concrete, wood, and metal debris were encountered. No RCRA constituents were found above SAL in soil and drill core samples collected from the periphery and underneath the burial area or in samples from the test pits. Therefore, PRS 39-001(a) is recommended for NFA.

5.1.1 History

Anecdotal information from long-time site workers suggests that PRS 39-001(a) consisted of two burial pits that were in operation between 1953 and 1979. The pits were used for disposal of materials consisting of debris from firing sites, empty chemical containers, and office waste. Hazardous and radioactive materials that may have been disposed in the pits before 1976 include lead, silver, copper, brass, iron, steel, thallium, cadmium, mercury, beryllium, thorium-232, natural and depleted uranium, PCB-containing oils, HE, and solvents. Anecdotal information suggested that these disposal pits are located east and north of Building TA-39-69. Part of one pit was thought to be covered by Building TA-39-69 and the other was thought to be under the basketball/volleyball court area. A geophysical survey conducted as part of the RFI did not define the exact boundaries of the pits, but did indicate anomalies west of the area along Ancho Road. An earlier geophysical survey indicated many large ferromagnetic objects in the general area where the pits are presumed to be located. Site personnel indicated that large stainless steel targets (1- to 2-ft diameter and 2-ft long) were buried onsite, but most likely they were buried at PRS 39-001(b) rather than at PRS 39-001(a). These targets were used in the dual-stage gas gun apparatus located in Building TA-39-69 and captured plutonium projectiles. Before disposal, the targets were decontaminated, the resultant waste was disposed at TA-54.

This PRS is discussed in further detail in Section 5.1 of the RFI work plan for OU 1132 (LANL 1993, 1089).

5.1.2 Description

Beyond that discussed in Chapter 2, no additional geology, hydrology, soils, or wildlife habitat information is available. However, a geomorphic evaluation of the canyon bottom and associated runoff area is presented in Appendix E.

5.1.3 Previous Investigations

No previous investigations have been performed at this site.

5.1.4 Field Investigation

The objective of the investigation at PRS 39-001(a) was to determine if COPCs are present on, in, and around the burial area and to determine whether COPCs may have migrated from the burial area. The conceptual release model for the site includes the erosion of contaminants from the surface of the burial area, exposure and transport of materials from the burial area in the local stream channel, and subsurface migration from the buried waste. The most likely conceptual mechanisms for migration of contaminants from the burial area are subsurface flow of water and vapor-phase transport. Field efforts at PRS 39-001(a) consisted of a radiation survey and geophysical surveys to aid in locating sampling points, sampling surface and near surface soils

5.1.10 Preliminary Ecological Assessment

In cooperation with the New Mexico Environment Department and EPA Region 6, the Laboratory ER Project is developing an approach to ecological risk assessment. Further ecological risk assessment at this site will be deferred until the site can be assessed as part of the ecological exposure unit methodology currently being developed.

5.1.11 Conclusions and Recommendations

Based on NFA Criterion 5, NFA is proposed for PRS 39-001(a). A request for a Class III permit modification will be made to remove this PRS from the HSWA module of the Laboratory RCRA operating permit.

5.2 PRS 39-001(b) - MDA Y

PRS 39-001(b) is a waste burial area on the east side of Ancho Road across from Building TA-39-56. The original of the trenches at this site has been designated MDA Y. RCRA organic constituents and uranium have been found above SAL in soil collected from test pits dug into the waste. During the excavation of the test pits, office trash, concrete, wood, wire, metal debris, a compressed gas cylinder, and a cache of a reactive substance (nitrocellulose, memo from Spontarelli to Vasilik, DX-2:96-105, March 4, 1996) were also found. A human health risk assessment indicates that the reported concentrations of those constituents do not pose an unacceptable risk to human health under the institutional control scenario (i.e., industrial land use). Therefore, this PRS is recommended for NFA.

5.2.1 History

PRS 39-001(b) was reported to consist of three pits (trenches), two at the northern end and one at the southern end. Pit 1 (MDA Y), measuring approximately 148 x 20 x 12 ft deep, was excavated in the late 1960's; Pit 2, about the same dimensions, was in use from about 1976 to 1981; and Pit 3, directly south of the other two, was in use from 1981 to 1989. All pits were closed and covered by May 1, 1989. Although a fourth pit was mentioned in the SWMU report (LANL 1990, 0145), geophysical surveys and RFI sampling were not able to confirm its existence. The geophysical surveys also indicate that the burial area is not a series of well-defined trenches or pits but, in fact, a general burial area.

The area was used for disposal of materials containing debris from firing sites, empty chemical containers, and office waste. Wastes from other sites may have been disposed here. Site personnel indicated that large stainless steel targets (1- to 2-ft diameter and 2-ft long) were buried on site and most likely they were buried at PRS 39-001(b) rather than at PRS 39-001(a). These targets were used in the dual-stage gas gun apparatus located in Building TA-39-69 and captured plutonium projectiles. Before disposal, the targets were decontaminated and the resultant waste was disposed at TA-54. Hazardous and radioactive materials disposed in the area before 1976 probably include lead, silver, copper, brass, iron, steel, thallium, cadmium, mercury, beryllium, thorium-232, natural and depleted uranium, PCB-containing oils, HE, and solvents.

This PRS is discussed in further detail in Section 5.1 of the RFI work plan for OU 1132 (LANL 1995, 1089).

5.2.2 Description

Beyond that discussed in Chapter 2, no additional geology, hydrology, soils, or wildlife habitat information is available. However, a geomorphic evaluation of the canyon bottom and associated runoff area is presented in Appendix E.

Los Alamos National Laboratory

Individual Permit Application for Storm Water Discharges from Solid Waste Management Units and Areas of Concern

Permit Application Number NM0030759

Supplemental Information Submittal (Third of Four) Volume 1

December 21, 2007



LA-UR-07-8364

LOS ALAMOS NATIONAL LABORATORY

SUPPLEMENTAL INFORMATION SUBMITTAL FOR
INDIVIDUAL PERMIT APPLICATION NUMBER NM0030759

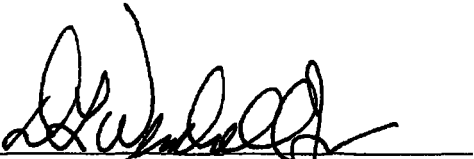
CERTIFICATION STATEMENT OF AUTHORIZATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Richard S. Watkins, Associate Director
Environment, Safety, Health & Quality
Los Alamos National Security, LLC

12/20/07
Date



Donald L. Winchell Jr., Manager
Los Alamos Site Office
National Nuclear Security Administration

12/20/07
Date

Sites Proposed To Be Permitted Under NPDES

SITE ID: 01-001(f)**Site Description:**

SWMU 01-001(f) is the location of a former septic tank (structure 01-140) that was installed in 1945 and served HT and FP Buildings. The septic tank outfall discharged into Los Alamos Canyon. The outfall area is known as Hillside 140. HT Building was used to heat-treat and machine natural and enriched uranium. FP Building was a foundry for non-radioactive and nonferrous metals. In 1975, the septic tank, its inlet and outlet lines, and surrounding soil were removed. In 1995, soil with elevated concentrations of total uranium was removed from the upper and lower slopes of Hillside 140.

Current Site Condition:

The site is located on a mesa top. The ground/canopy cover is thick (>75%). The slope of the area impacted is gradual (10-30%).

Discharge/Conveyances:

There is visible evidence of run-off discharging from the site. Run-off terminates in a drainage or canyon. The run-off is channelized in the form of natural channel(s). There is no visible erosion created by the run-off at this site. There are structures creating run-on at this site. Current operations are not creating run-on at this site. Natural drainages create run-on at this site.

Receiving Waters:

Los Alamos Canyon

Erosion Potential Score:

39.8